

III. REMARKS

1. Claims 1, 4-7, 17, 18, 20-22 and 24-25 are amended.
2. Claims 5-7 and 20 are amended to address the 35 U.S.C. §112, second paragraph rejection.
3. Claims 1-2, 4, 10-13, 16-18 and 21-24 are not anticipated by Ebrahimi under 35 U.S.C. §102(b).

Claim 1 recites a handwriting input area that includes a writing start area that is substantially smaller than the handwriting input area. This is not disclosed or suggested by Ebrahimi. Ebrahimi discloses a number of writing boxes 12. (Col. 1, lines 65-66; Fig. 1). As shown in FIG. 1, the writing areas 12 are the same size and a fixed size. There is no disclosure or suggestion that a writing start area is substantially smaller than the handwriting input area as claimed by Applicant. The Examiner refers to FIGS. 2 and 3, references 44 and 46. However, it is clearly evident from viewing these figures that the writing areas 42 are for a fixed size and constant location. The characters 44 and 46 are within the writing areas 42. (Col. 3, lines 26-29). There is no disclosure that the start area is considerably or substantially smaller than the handwriting input area. Thus, at least this feature cannot be anticipated.

The remaining claims should be allowable at least by reason of their respective dependencies.

4. Claims 3, 5-9, 14, 15, 19, 20 and 25 are not unpatentable over Ebrahimi and Seni under 35 U.S.C. §103(a).

First, the Examiner has not established the requisite motivation for purposes of 35 U.S.C. §103(a). To establish a prima facie case of obviousness for purposes of 35

U.S.C. §103(a); the Examiner must "identify a reason why a person of ordinary skill in the art elements in the manner claimed". (USPTO memorandum, Supreme Court decision on KSR Int'l Co., v. Teleflex, Inc., May 3, 2007).

The Examiner states that it would be obvious to incorporate Seni's interface control operation into Ebrahimi's hand held device because this is an "advancement" for Ebrahimi's device to function both as a writing and a scrolling (mouse). It is respectfully submitted that an "advancement" is not a sufficient reason to combine the references in the manner claimed. Generally, inventions reflect advancements in technology. Thus, does the mere possibility that combining any two inventions might result in an advancement provide "motivation" to combine the references? It is submitted that mere "advancement" is not a specific reason to combine the references to achieve what is claimed by Applicant. It is merely a result that might be achieved. However, motivation requires a specific reason to pick two references and combine them for a specific purpose. "Advancement" is merely an ancillary and arbitrary result. It is not a "reason".

Furthermore, the Examiner's statement that the combination would allow Ebrahimi's device to function "both as a writing and a scrolling (mouse)" is not logical. Ebrahimi is a graphical handwriting recognition user interface. Areas are designated on the display to enable the entry of handwritten information. (See Abstract). Seni relates to written message and note composition on small screen sized devices [0002]. A scrolling mechanism enables a portion of the touch screen to appear to move as entries are input so as to continuously present screen space for user input [0029; claim 1]. This does not appear to have any immediate application or benefit to Ebrahimi because in Ebrahimi, the handwriting boxes allow the user to immediately begin printing the next character in the second of the handwriting boxes, or wait for the handwriting recognition application to recognize the printing in the current handwriting box. The recognized character is placed at a cursor insertion point. (Col. 2, lines 5-12). Given

this recognition and placement/insertion of Ebrahimi, it is difficult to see how the concept disclosed by Seni could be implemented, let alone be beneficial. Ebrahimi does not need scrolling since each "character" is displayed in a box. Thus, there is no motivation to combine Ebrahimi with Seni to achieve what is claimed by Applicant and a prima facie case of obviousness is not established.

Also, claim 5 is not obvious over the combination of Ebrahimi and Seni because claim 5 recites that the writing start area is placeable in an arbitrary location within the handwriting input area. Ebrahimi only discloses writing boxes 12 that are of fixed size and are in a fixed location on the GUI10. There is no disclosure of causing the writing start area to appear at different locations.

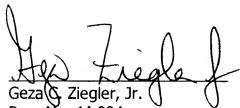
Claim 6 is not obvious over the combination of Ebrahimi and Seni because claim 6 recites that the location of the writing start area depends on the cursor position. There is no such disclosure or suggestion in the combination of Ebrahimi and Seni.

The remaining claims are allowable at least for the reasons stated above and their respective dependencies.

For all of the foregoing reasons, it is respectfully submitted that all of the claims now present in the application are clearly novel and patentable over the prior art of record, and are in proper form for allowance. Accordingly, favorable reconsideration and allowance is respectfully requested. Should any unresolved issues remain, the Examiner is invited to call Applicants' attorney at the telephone number indicated below.

The Commissioner is hereby authorized to charge payment for a one-month extension of time and any other fees associated with this communication or credit any over payment to Deposit Account No. 16-1350.

Respectfully submitted,


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30 May 2007
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